

Electronic Benefit Transfer (EBT) Project
Participation of Client Advocates and Community Organizations
in California's EBT Project:
Inclusion in decision making and access to information

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This document is intended to describe the extensive input and access to information that has been provided to stakeholders representing the interests of clients that will use the EBT system to receive program benefits.

The Client Advocate stakeholder group has had a significant role in ensuring that the California EBT requirements, contained in the state's Invitation to Partner (ITP HWDC 8024), reflect the best interests of clients to the maximum extent possible. The ITP contains all of the requirements defining what type of system is required, what features it will have, services to be provided, and performance standards. The EBT contract terms and conditions, which resulted from the state's procurement process and negotiations with the successful bidder, does not modify the requirements contained in the ITP; rather, it describes the roles and responsibilities of the contracted parties, and defines liquidated damages and protections for the state if the contractor fails to deliver the system as described in the ITP. All requirements enumerated in the ITP are incorporated by reference as terms of the contract.

Participation in EBT Requirements Development and Procurement of the Contractor

1. EBT Executive Committee (EBT Committee)

- ?? **Established:** October 1997 as a result of requirement in California's EBT law.
- ?? **Membership:** Representatives of all stakeholders in the EBT system as specified in state law, including state departments, county welfare departments, client advocates, and retailers. Legal Services of Northern California and Consumers Union have represented clients' interests at this Committee.
- ?? **Purpose:** To advise the California Department of Social Services (CDSS) and the Health and Human Services Data Center (HHSDC) on the procurement of EBT services and the development and implementation of EBT in California. Confidentiality required regarding procurement sensitive information.

?? Areas of Participation:

- Advise on significant EBT policy issues that impact multiple stakeholders
- Review and advise on procurement process and outcomes
- Receive project status updates, monitor activities and timelines
- Advise on the development and implementation of the statewide EBT Project

2. Client Advocate Advisory Group

?? Established: October 1997

?? Membership: Legal Services of Northern California, Consumers Union, San Fernando Valley Neighborhood Legal Services, Legal Aid Foundation of Los Angeles, Legal Aid Society of San Diego

?? Purpose: To provide input to the EBT Project, representing the interests of those who will use the EBT system (clients), in the development of project requirements. Confidentiality required.

?? Areas of Participation:

- Participated in policy discussions and issue resolution
- Reviewed and commented on drafts of the Invitation to Partner before finalization
- Reviewed and commented on model contract terms
- Reviewed and commented on proposal evaluation criteria
- Participated in review of bidders' proposals in specific areas of concern (cash access, customer service)
- Participated in Confidential Discussions with bidders in specific areas
- Reviewed final negotiated contract with Citicorp and provided comments
- Observed card design focus groups conducted by a marketing firm
- Participating in developing plans to work with banks to exempt EBT cards from ATM surcharges.

?? Areas of Influence: The following requirements were established based on the input and influence of the Client Advocate Advisory Group.

- Training materials in the 10 languages most commonly spoken by welfare recipients in California.
- Customer Service Automated Response Unit in 10 languages.
- Operator assisted customer service for reporting a lost card in all languages 24 hours per day; extended live customer service hours in multiple languages to 7 a.m.-9 p.m. for other customer service needs.
- Training opportunities available outside of regular business hours (i.e., evenings and weekends) to accommodate working recipients.
- Toll free training number available to supplement in-person training opportunities for counties using mail-based card issuance.

- Strict busy signal and wait time policies for the customer service telephone lines.
- No cost for replacement cards.
- Monitoring of card non-use during the implementation period to detect and help clients who may be having trouble accessing the system.
- Plans to provide outreach to special needs populations that may have more trouble with the EBT transition (e.g., seniors, ethnic groups, etc.), and to supplement the basic training materials required by Contractor.
- Contractor will provide training to interested Community Based Organizations (CBOs) so that they are knowledgeable about EBT functionality and implementation plans.
- Cash benefit staggering over three days instead of five.
- Exemption from cash benefit staggering for individual clients based on hardship. Provision that a county may request waiver from CDSS from cash benefit staggering if caseload is low.
- Inclusion of wide variety of options for cash access (POS, ATM, bill payment, money orders, etc). Inclusion of ATMs as a part of the cash access plans.
- Ability to withdraw the full cash benefit amount within the first four transactions per month.
- Iterative cash access plan development process, allowing for input from concerned community members.
- Cap on transaction fee imposed by the Contractor after the first four cash withdrawals per month. Lower cap on the fee allowed for balance inquiry at ATM machines.
- Requirements for mapping caseloads to the cash access locations available.
- Lists of cash access locations updated monthly by the Contractor and provided to the county.
- EBT System compatible with county direct deposit programs.
- Printed two-month transaction history mailed to clients upon request at no cost.
- Numerous editorial comments and corrections to clarify or strengthen ITP and contract requirements
- Established the broader, non-confidential Client Advocate Forum at the request of the Client Advocate Advisory Group

Ongoing EBT Project Information Sharing Activities

1. EBT Committee (see above)

The EBT Committee will become the venue where the Contractor presents its formal monthly status reports to the State.

2. EBT Client Advocate Advisory Group (see above)

Ongoing activities oriented toward helping the EBT Project facilitate a smooth EBT transition, through policy discussions, planning for supplemental training, planning for pilot evaluation, and facilitating communication with other advocates.

3. Client Advocate Forum

?? **Established:** March 2000

?? **Membership:** Membership is not limited to this list. ACORN, Alexandria House (LA), CA Food Policy Advocates (Fresno), CA Hunger Action Coalition, Catholic Charities of CA, Consumers Union, Eden I&R (Alameda) Emergency Services Network (Alameda), Legal Aid Foundation of LA, Legal Aid Society of San Diego, Legal Services of Northern California, Sacramento Hunger Commission, San Fernando Valley Legal Aid, Strategic Actions for a Just Economy (SAJE – LA), Western Center on Law and Poverty,

?? **Purpose:** The EBT Client Advocates Forum was established by the State to expand the base of client advocates and community based organizations that are knowledgeable about EBT, to facilitate the further dissemination of accurate information about EBT to other community groups and clients as EBT is implemented throughout the State. Information discussed is not confidential.

?? **Areas of Participation:**

- Updates on the status, timelines and plans for the EBT Project.
- The project staff provides education on the EBT system requirements and functionality, and provides information as needed to address participants' concerns about EBT.
- A forum to enhance communication between the EBT Project, participating advocates, and the greater community by developing and disseminating educational materials, fact sheets, frequently asked questions, and other tools to address areas of concern related to the EBT project.
- The EBT Project has provided training and information on the following topics: EBT Overview Training, Role and Responsibility of the EBT Contractor, County cash decision and county preparation activities, cash access plans and possible fees, confidentiality of client data in the EBT system, and farmers' market plans for EBT usage.
- Open access to project staff members by phone and email between meeting for questions and answers

?? **Areas of Influence**

- Provide input to the state about concerns related to EBT. Such input is taken into consideration in project decision-making, and development of educational tools and project communication.
- Provide feedback to the State on EBT development as it relates to impact on clients.
- Provide input into the content of the project website.

- Facilitate communication and transfer of knowledge with advocates and organizations within the community that are not participating in the Forum.
- Identify issues of concern and generate ideas about how best to address them.

4. Project Website: www.ebtproject.ca.gov

The EBT Project Website was launched as a public information tool on February 15, 2001. It contains Invitation to Partner requirements and other project documentation, frequently asked questions and answers, schedule and implementation plans, resources for public use, and links to other project-related websites.

5. County Meetings with Local Stakeholders

EBT Project staff members have participated in several meetings with counties and their local stakeholders. The Project staff is made available as much as possible to attend these informing meetings to ensure that correct information is being shared with stakeholders.